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## Conference Paper

# 'Global modernity' in China and France: Flattening boundaries between Foreign Brandscapes & Regional Urban Heritage

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## Abstract

This paper studies transnational architecture and 'global modernity' through the reading of two photographs of foreign, iconic buildings in China and France. The first photograph by Hufton + Crow (2012) is of the Galaxy SOHO in Beijing by the Iraqi-born, British architect, Zaha Hadid Architect (ZHA) in collaboration with the state-owned Chinese BIAD (Beijing Institute of Architecture and Design). The landmark, futurist ZHA building looks to have gobbled up the local urban heritage around it. The second photograph by Marc Petitjean taken in 1975 is of the Pompidou Centre in Paris under-construction and was designed by Richard Rogers and Renzo Piano with Gianfranco Franchini. In front of the Pompidou Centre is Gordon Matta-Clark's *Conical Intersect* (1975) contained within a row of soon-to-be demolished 17th century town houses. Both the Galaxy SOHO and the Centre Pompidou are examples of transnational architecture where foreign architects crossing new global market frontiers, design landmark buildings at the expense of local heritage. They show how the rise in image culture tied to capitalism – through global branding and brandscapes – and promoted by 'governmentality' nurtures a culture of producing and consuming foreign architecture to redefine the image of nation state. The paper discusses how globalisation 'flattens' regionalism for modernisation. Foreign architects working on transnational architecture and their clients have an ethical responsibility to resist 'cultural [architectural] imperialism' (including the visual allure of the West as *the* alpha culture) and should instead engage deeply with regional and domestic urban values, typologies, scales and traditions to be critical of global capitalism.

**Keywords:** Global Modernity, Galaxy SOHO, Pompidou Centre, Gordon Matta-Clark, Regional Urban Heritage, Capitalism

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## 1. Introduction

While architects and styles of architecture have always crossed borders, architectural practices have shifted from national or regional projects in their home country to cross-cultural or transnational practice built anywhere in the world [1]. As transnational agents, architects participate in the production, consumption, and reading of architecture [2].

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**Figure 1:** (a) The Galaxy SOHO, Beijing by Zaha Hadid Architects (ZHA), 2009-2012 [background] © Hufton+Crow/VIEW, 2012. (b) Rue Beaubourg (Centre Georges Pompidou, Paris by Richard Rogers and Renzo Piano, with Gianfranco Franchini, 1969-1977 [background]) © Marc Petitjean, 1975.

Because “visual images often travel before or with the architect’s name or personality” [3], an increasing number of select architects build in countries who seek foreign styles. But while visual culture opens architecture up more widely to consumption, it also provides a space of critical enquiry *within* the visual image into the social, economic and political nature of transnational architecture.

This paper critically examines the visual space *within* two photographs of landmark buildings designed by foreign architects in different capital cities, one in the East, the other in the West. The first photograph is of Zaha Hadid Architect’s (ZHA) Galaxy SOHO (Figure 1) in the Dongcheng District in Beijing taken by British-based architectural photographers, Hufton + Crow in 2012. The second photograph is of the Pompidou Centre (Figure ??) by Richard Rogers and Renzo Piano with Gianfranco Franchini in the Beaubourg quarter in Paris taken by French photographer, Marc Petitjean in 1975.

The Galaxy SOHO (2009-2012) is a 15 storey, 330,000 m<sup>2</sup> retail mall, office and entertainment complex in which ZHA have an office. It was designed by Hadid in association with Patrik Schumacher and in collaboration with the state-owned Chinese BIAD which was established in 1949, the same year the P.R.C was founded. In Hufton + Crow’s photograph, the futurist ZHA building once described as an ‘alien arrival’ [4] looms over the neighbouring Hutong streets and looks to have just gobbled up the local urban heritage around it in order to ground itself in the city. The Pompidou Centre (1969-1977) is a 10 storey, 100,000 m<sup>2</sup> building that contains a museum of modern art in Europe, a public library and a centre for music and acoustic research. It has a large public space to one side. The still under construction Pompidou Centre is foregrounded in Petitjean’s photograph by two soon-to-be demolished 17<sup>th</sup> century town houses which house the installation, *Conical Intersect* (1975) by the American artist and architect,

Gordon Matta-Clark. Unlike Petitjean's photograph published in black and white in *Metropolitan Rambuteau* [5] the Hufton + Crow photograph appears in Oliver Wainwright's article in *The Guardian* [4] in colour, not black and white as flattened here. In this paper I undertake a comparative reading of the two photographs as historical visual artefacts and ask three questions: first, is, and then what is, the transnational exchange between the foreign architect's design of the building and the local region; second, what does it mean to 'be modern' in architectural design in Beijing and Paris at the respective times and; third, what do the two photographs tell us about the meaning of landmark brandscape buildings as signifiers of 'governmentality' (or governmentality and rationality) [6] and nation-state image-making.

## 2. China's Modern Economic Awakening and the Galaxy SOHO by an Iraqi-born, British architect

On December 13, 1978 the Chinese politician and leader of the People's Republic of China from 1978 to 1989, Deng Xiaoping delivered a speech which ushered in a new era of opening up and economic reform which was in vast contrast to former Maoist economic ideology. Deng quoted in MuZhlhahn [7] asked members of the Chinese Communist Party to free their minds from the belief that capitalism was their enemy in order to make China a "modern and powerful socialist state." Tired and damaged by the ambitions and strategies of Mao's government and by the Cultural Revolution, the 'new' China under Deng sought 'to be modern' through a fresh path towards national reinvention. Rather than be a closed society that had been quarantined, Deng pursued a policy of 'reform and openness' (or *gaige kaifang*) mainly directed at opening China up to global market exchange with international trading partners.

Modernisation first began in China in 1840. During that first period of opening up, China traded tea, silks and porcelains with mainly British merchants. But because the Chinese did not buy British products in return, The British East India company and other UK merchants began to smuggle Indian opium into China illegally ultimately leading to the first war in China called the Opium War. The latest phase of opening up has again been about global economic exchange but has also been accompanied by a rapid shift from traditional urban and rural living to the taking up of modern life in the city, literally moving Chinese people out of their traditional homes. This has been a cosmetic, structural and psychological makeover of the bodies, minds, homes and cities of the Chinese like no other, in terms of its rate of change – from demolition to re/construction – through a reframing of political ideology that mixes two former

enemies – socialism and capitalism [8]. In the span of some 40 years the Chinese polis were encouraged to shed their drab, sexless, proletariat blue, grey or black Mao worker's suits and wear Western brands. The Chinese 'consumer-citizen' has learned to shop and travel at home and abroad, some argue for "historical amnesia" post-Cultural Revolution [9]. Whether this is the reason or not, middle-class and upper-class affluent Chinese now freed from their anti-capitalist shackles shop and consume the pleasures of visiting regions in China and overseas and of buying brands from KFC to Chanel and beyond. In architectural practice, the transnational exchange works two ways with Chinese architects moving more freely to work abroad and foreign architects capturing new markets in mainland China and Hong Kong for building opportunities. One of the most notable foreign architects working in China in the latest period of modernisation is Zaha Hadid Architects.

As many students do after they finish their studies, Zaha Hadid travelled outside the UK after graduating. In 1981, at the age of 31, a year after she became a naturalised British citizen and set up ZHA, Hadid first visited China travelling "by train to various towns and met Chinese who'd never seen foreigners before" [10]. Melinda Liu explains that 'the love affair' between Hadid and China began that year; "China was just awakening from its paranoid Maoist slumber and opening up to the outside world. Hadid was fascinated. She bought every color of Mao suit available (black, charcoal grey, green, blue). The cities were dark and drab, but she said it was a "very, very important trip." ... [Hadid] told *Newsweek* ... "Even then I thought, 'You could do a lot of building here'" [10].

Two years later Hadid entered a competition to design a private recreation club called The Peak leisure club, located on Victoria Peak in the hills of Kowloon overlooking Hong Kong. She produced a series of paintings on canvas for the competition which would later come to define her visionary utopian style that sustained her professional career. "... [Hadid's] study of traditional Chinese art and architecture had also played a role in shaping her aesthetics. 'I became fascinated with the landscape and the organization of the courtyards, the light and the shadow,' she said of her first visit to China. [In the Peak project] 'All of these different layers unfold' " [11].

In 1984, having won The Peak competition, Hadid was photographed showing Prime Minister Margaret Thatcher the model of her winning design which would never get built. This is because after Thatcher and Deng's signing of the international bilateral treaty known as the Sino-British Joint Declaration in 1984, the client lost the site for The Peak project [11]. Although Hadid was not able to realise The Peak leisure club,

she developed a lifelong affinity with China arguably because it was her first potential patron.

After the 2008 Olympic games in Beijing the Chinese government and private developers increasingly commissioned landmark buildings by foreign brand architects. For instance, the client for Galaxy SOHO, Soho China developed a taste for Hadid's architectural style. Soho China is a Chinese, Beijing based, real-estate development company founded by couple, Pan Shiyi "who grew up in poor Gansu Province" – and Zhang Xin – "a former factory worker" [12]. Soho China focus on the production of high-end designer commercial buildings in China, not overseas, and have also worked with world renowned architect, Kengo Kuma.

After Galaxy SOHO, Soho China commissioned ZHA to design other projects for them. These include Wangjing Soho in Beijing (2014) which consists of three curvilinear asymmetrical skyscrapers containing a mixture of offices and commercial retail space and Sky Soho (2010-2014) near Shanghai's Hongqiao transportation hub [12]. At the time it was built, the Galaxy SOHO was one of the largest projects being produced in the ZHA office.

According to ZHA, the design of the Galaxy SOHO aims to reflect traditional Chinese architecture in two ways. First, it consists of four separate oval domed shaped towers that are inspired by the traditional Chinese courtyard which Hadid became fascinated with in the early 1980s. Second, the design is influenced by the ancient Chinese terraced fields of agriculture through its use of plateaus that create a continuous, fluid interior space [13]. While the planning and formal composition of the Galaxy SOHO refer, in theory, to national Chinese architectural concepts, they are reduced and abstracted to an unrecognisable level within the design itself. It becomes generic 'blob' style architecture. In making a somewhat obtuse reference to Chinese courtyards and rural landscapes, the Galaxy SOHO makes no direct connection to its surrounding Hutong context, instead treating the site for the project as a *tabula rasa* or 'blank canvas'.

In *Times of Creative Destruction*, Alexander Tzonis and Liane Lefaivre explain "pioneering projects that would bring in new techniques of construction, demonstrate China's recent achievements and compete globally as real estate for wealthy tenants" but often mean "that architects responded to the challenge ... by ignoring regional context" [14]. Much like The Peak painting canvases, Hadid saw China as "an incredible empty canvas for innovation" [15].

After the Galaxy SOHO won the Royal Institute of British Architects (RIBA) Lubetkin Prize in 2013, the Beijing Cultural Heritage Protection Center (CHP) wrote to the RIBA to voice "disappointment and offence." The letter labelled the Galaxy SOHO as a "typical

unfortunate example [of] the destruction of Beijing old town” and explained it “caused great damage to the preservation of the old Beijing streetscape, the original urban plan, the traditional Hutong and courtyard houses” [16]. The letter urged the RIBA to “have a deeper understanding of the current situation in modern Chinese society”. The award could encourage developers and authorities to continue with the “destruction of cultural heritage sites”, which has “been a very common offence committed by many of the growing rich and powerful” [17].

Since the rise of foreign architects building ‘trophy’ projects in the country, China’s State Council and the Communist Party’s Central Committee announced in 2016 that “oversized, xenocentric, weird” buildings would no longer be approved for construction [18]. This signifies a move away from the design excesses of the mostly Western architects experimenting with China as a ‘blank canvas’ for projects that some argue they couldn’t get built in their own countries. Still, what the Hufton + Crow’s photograph shows is the perpetual tussle between historic city and modern city, a phenomenon also represented in Petitjean’s photograph of the Pompidou Centre.

### 3. France post ‘May ‘68’ and the Pompidou Centre by Italian-born architects working in Britain

Between the 2nd of May and the 23rd of June 1968, students and factory workers demonstrated in universities, rioted in the streets and went on strike across France protesting against the rise of capitalism, consumerist culture and American imperialism in French universities and companies. Known as the ‘May ‘68’ movement, the protests – which almost brought down the government of then President of France, Charles de Gaulle– were quelled due to Georges Pompidou, the then conservative Prime Minister of France. After ‘May ‘68’, Georges Pompidou (who later became President) sought to restore order, stabilise, modernise, tame and redefine the image and status of Paris as a leading European city through the construction of a series of national building projects or monuments. He saw that the France of 1970 needed to ‘be more modern’ through the provision of a new public museum of the 20<sup>th</sup> century sited on the vacant, Plateau Beaubourg site.

During the 1960s city planners in Paris had moved the prized food markets of Les Halles to make way for cultural institutes. The streets surrounding the area were those that the ‘May ‘68’ students had protested upon. Although the idea of a multicultural arts complex was initially proposed by the French first Minister of Cultural Affairs, André Malraux, it was Pompidou who mobilised the project on the *tabula rasa* Beaubourg site



through an open competition. The first European international architectural competition of its kind in France, the Pompidou Centre competition attracted 681 competitors from 49 different countries. The winning design – chosen by a jury that included the world-renowned architects Jean Prouvé, Philip Johnson and Oscar Niemeyer – was by the virtually unknown team of Rogers and Piano in collaboration with Franchini who were then aged in their 30s.

Born in Florence, Italy in 1933 to British parents and nephew of the Italian modern architect, Ernesto Rogers, Rogers first met Piano in London, where they were both then living, through an introduction from their doctor, a former client of Rogers. Born in Genoa, Italy, Piano had moved with his family to London to find work. Rogers explains that while he was “familiar with Renzo’s work” it was “some point in the late 1960s ... [that they] met and clicked immediately” [19]. While they had empathy for the ‘May ’68’ protestors, the fact they were foreign architects not involved in the 1960s politics of France was one of the reasons they were chosen as winners. Piano explains “we got the job in the first place precisely because we were outside of that tradition [The Grand Prix de Rome and its closed circle of 24 architects]” [19] and the Beaux-Arts tradition.

For Georges Pompidou, it was essential that outside architects offer Paris an alternative image of its new stable future regardless of any legislation that was in place preventing this to happen. Rogers explains; “We were ... informed that we were not allowed to practise architecture in the country – some antiquated by-law stipulated that only French architects could design French cultural buildings in Paris. But this is where President Pompidou himself really helped us out, pushing through a new act that allowed us to work” [19].

The design philosophy of the Pompidou Centre is inspired in part by the interest that Rogers and Piano had in the architecture of the British architects, Archigram and Cedric Price who explored and experimented with new forms of technology, media, and mechanised architectural modernity. Rogers and Piano wanted to design a building that changed and moved and “embraced the gaudy glamour of film and advertising” [20]. They sought not to design a monument but an event, a happening. Piano describes it as “not a building but a town where you find everything – lunch, great art, a library, great music”. The point was, as Rogers put it, that “culture should be fun” [20]. The programmatic language of the Pompidou Centre is much like a shopping mall, an interior experience that showcases and sells the consumption of art. From the 10<sup>th</sup> floor, there is a democratic rooftop view of the city.

Inspired by Rogers’ interest in the Italian Piazza del Campo in Siena, the large public piazza on the east side of the Pompidou site offers public space back to Parisians.



Designed as a 'big room' facing a screen façade that would communicate with other museums of modern art, the piazza was to be "a people's place" [21]. There are no design references made to the historical city or streets in Paris or to any ideas about France or French architecture. This is a building that facilitates a democratic-capitalist experience of famous art represented through the modern technological image of the 'art factory' [22]. Some locals compared the Pompidou Centre to an oil refinery and nicknamed it 'Pompidolium' [23]. Others described it a "cultural supermarket which reflects the end of the Sixties." [21]. Regardless of public criticisms of the project and it being beset with construction problems and lawsuits its completion in February 1977 brought international recognition to the young British based architects.

On the right of Petitjean's photograph, in front of the Pompidou Centre can be seen two 17<sup>th</sup> century town houses that Matta-Clark occupied as part of his *Conical Intersect* for the 1975 Paris Biennale. *Conical Intersect* is a temporary, performative, artwork that only remains as photographs and a video of its activist performance because the buildings were later demolished. The artwork involved the boring out of "a tornado-shaped hole that spiraled [sic] back at a 45-degree angle to exit from the roof. Periscope-like, the void offered passers-by a view of the buildings' internal skeleton" from the street [24]. It creates a short-lived anti-monument or 'nonument' to contemplate civic space. Describing the two town houses as "an old couple" Matta-Clark saw them as "literally the last of a vast neighborhood of buildings destroyed to 'improve' the Les Halles-Plateau Beaubourg area" [25]. A condemnation of the gentrification of the area and the construction of the Pompidou Centre as a part of that process, *Conical Intersect* has, to quote Xavier Wrona, at its core a critique of 'the logics of urban renewal', 'the processes of modernization'; it is an 'intriguing attack on modernity' [26]. Matta-Clark's anarchitecture – a campaign 'against architecture' – was enacted through a praxis that is both 'creative and destructive' [27] replicating the process of urban transformation that the Beaubourg Plateau was undergoing to make space for the Pompidou Centre. But in contrast to the Pompidou Centre that reaffirms the power of architecture for state agendas, Matta-Clark's surgical incision into the town houses takes place on architecture that is already a condemned corpse.

Matta-Clark's anarchitecture sought to interrogate, rather than reaffirm, architecture's relationship with capitalism and power. He challenged the hegemony of architectural monuments. Matta-Clark "thought that buildings should reflect society and the character of the city's districts, rather than alienat[e] people through... monumental physical presence..." [27]. His interest was in the powerless minorities represented by "the old [town house] couple" who were dispelled from their homes for a new modern image of Paris

reinventing the museum as a site of production and consumption of art and architecture for capitalism and in the name of ‘governmentality’ or government rationality [6].

## 4. Images, Capitalism and Creative Destruction

In the same year that the Pompidou Centre was completed Susan Sontag published *On Photography*. Like *Camera Lucida* [28], *On Photography* argues that while photographs flatten 3dimensional space into two dimensions they stand for something other than themselves because they signify social, human, historical and political conditions in the space photographed. For Sontag, photographs are also connected to capital accumulation because “A capitalist society requires a culture based on images” [29].

Capitalism is dependent on the continual production and consumption of visual images of new products, experiences and cultures in the media. In architecture, innovative building designs by architects are valuable commodities in a pervasive architectural image culture that can enhance an architect’s professional visibility globally. The cachet of the architect celebrity has become a draw card for cities and cultural institutions to sell themselves through the uniquely looking building. In 2008 Frank Gehry had “perhaps the strongest architectural franchise in the world” [30]. Gehry’s Bilbao Guggenheim Art Gallery is an arguably seminal turning point in consolidating the Gehry brand because the building created a ‘Bilbao effect’. The ‘Bilbao effect’ is the phenomenon that can come from a signature building creating credibility that is used for “deeply politicised place marketing” [3]. More and more wealthy urban politicians or developers worldwide invite a handful or so of signature architects to design a landmark building in their city for tourist spectacle and entertainment. As stylish forms of Venturi, Scott-Brown and Izenour’s ‘The Long Island Duck’, icon buildings become monuments that are symbols or logos to identify a city’s skyline and enable city branding. But unlike earlier periods of metropolitan development, brandscapes tie physical urban development to corporate value systems. According to Anna Klingmann, in the twenty-first century landmark buildings are nowadays advertisements for corporate companies and institutions [31]. Brandscapes signify what image a city wants to project of itself through its monopoly corporations, corporate architects and consumption of corporate products.

Globalisation and global free trade has allowed architects to expand their portfolio. The more ‘icon projects’ [1] a corporate brand architect can produce and make publicly visible, the stronger their capacity is to build a brand identity in local and global design markets. But as Tzonis and Lefaivre note; “globalization’s contribution to the expansion of the capitalist system has become evident, through escalating cross-border branding

– of life-styles, of everyday objects and architecture, creating unprecedented wealth but also destroying the last remains of regional insularity and community identity” [32].

Many famous examples of icon projects that are inserted into a region that is seen to be in decline, such as Gehry’s Bilbao project, often ignore the area’s “physical and cultural identity while claiming to give new life to it” [32]. The Bilbao Guggenheim was criticised for this, seen “as an example of the latest stage of American cultural imperialism” [3] enacted in the Basque country. Arif Dirlik argues much foreign architecture today is “based on the assumption of working with a tabula rasa” and “contributes to the destruction of identity, memory and significance of place that characterizes today’s global modernity” [33]. Different to globalisation, global modernity is an image of ‘being modern’ everywhere and anywhere in the globe. It is an image that needs to relocate or destroy less valued architectures (Matta-Clark’s ‘old couples’), rituals and traditions in favour of new metropolitan culture, taste and corporate business. In contrast Dirlik calls for building practices that accommodate both the domestic and the foreign [33]. Modern urban renewal and development should not be about “vanishing ‘community’ and ‘place’” in a continuous cycle of construction and destruction and so on [14]. The unique identity of artefacts and residents in a region evidenced in its urban life, as Jane Jacobs observes, is a hallmark of diversity and cultural difference in modern cities that needs to be valued [34]. This involves active resistance to the contention that the world is, both architecturally and pictorially, “getting increasingly ‘flat’” [35]. The flattening of place and culture in favour of global modernity comes from capitalist and neoliberal ‘governmentality’ which exerts its power on the body polis through urban development.

## 5. Conclusion

The ability of a foreign architect to build their designs outside their homeland is seen to require “cross-cultural etiquette and understanding” [3]. There is the assumed need for the foreign architect to have “‘local knowledge’ about foreign cities” [3] including environmental issues. But often the architects are not always responsive to contextual, social or cultural issues. Some foreign icon projects are seen as a form of ‘aggressive cultural imperialism’ and the actual price of foreign architects working abroad can go well beyond the cost of construction, taking a cultural toll on the local environment in which their building is located [3]. There are important questions about the ethics of urban development by many corporate foreign architectural practices and their clients and the genuineness rather than tokenism of the foreign designs to embrace the values, traditions and peoples of the foreign country in which they build.

The two photographs of the landmark Galaxy SOHO and Pompidou Centre studied in this paper are more than visual records; they signify architectural and urban processes of capitalist consumption and production for global modernity. Although Hadid found a warmly welcoming home in China to practice as a foreign architect, a country with which she felt empathy from her first visit in 1981 and which valued her creativity from the outset, ZHA's architectural design for Galaxy SOHO makes an arguably simplistic attempt to engage with the Chinese context. While the plan of the Galaxy SOHO claims to be inspired by the traditional Chinese courtyard architecture and the rural Chinese landscape, both are abstracted beyond recognition. The Galaxy SOHO resembles many other contemporary icon buildings. It reaffirms the image of the valued global foreign architect in China who value-adds to the city brandscape.

Petitjean's photograph of the Pompidou Centre under construction is part of a series taken between 1972 and 1997 of the 'urban renewal' of the Beaubourg plateau. Unlike Hadid who was given the Galaxy SOHO as a private commission by a developer client, Rogers and Piano were foreign architects who won the project (not open to French architects) through an international competition initiated by Georges Pompidou who sought to redefine the image of Paris after 'May '68'. The design was selected because it offered an image of art museum which bore no reference to the existing Parisian museums, reflecting government imperatives. Rogers and Piano's 'art factory' aesthetic aligns with global architectural interests in modern means of industrial prefabrication, technology for spatial flexibility. In terms of having a response to Paris at the time, the young Italian born architects were inspired by the 'May '68' protests and sought to create an anti-icon. As Rogers explains; "I thought I was on the side of the streets" [21] but ironically the building has *become* an icon in Paris's brandscape.

In relation to the Pompidou Centre, Matta-Clark's *Conical Intersect* makes visually beautiful and alluring the violent destruction of the adjacent terrace houses to show their stories/storeys to street passers-by. Matta-Clark uses the 'the old couple houses' to accentuate spatial trauma before the site is made globally modern through flattening. What 'global modernity' means in this study of icon projects in China and France is the swerving of urban development towards gentrification and commercialisation. In order to stop the global flattening of our cities architects and their clients need to be more critical of brand architecture, commercialisation and capitalism. Rather than flatten cultural boundaries, it is recommended that architects consider how 'globally modern' architecture might emerge within and from the domestic. To use China as but one example, the words of American educated Chinese architect Liang Sicheng written in 1946 are worth recalling: "'Chinese architecture' between tradition and modernity 'faces

a grave situation'. 'Something new must come out of it, or Chinese architecture will become extinct'" [35]. To do this there is the need to eradicate the notion of Western culture as an alpha culture to be consumed and replicated. As Lee and Baumeister note in *The Domestic and the Foreign in Architecture*; "Often in our pursuit of progress and what we desire, our own self-image comes into conflict with our sense of security and the balance between the domestic and the foreign. There is a conflict between what we have, what we need and what we want, but once we attain what we want, we also develop a certain anxiety that, after all, our desire may be excessive and therefore may need to be reined in" [36].

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